

STATE OF NEBRASKA

DOCKET FILE COPY ORIGINAL

NEBRASKA EDUCATIONAL TELECOMMUNICATIONS COMMISSION

Television • Radio • Learning Services • Technology Services

NETN

COMMISSIONERS: Fred D. Brown, Crete
Randall Bretz, Lincoln Stan Carpenter, Lincoln

Douglas D. Christensen, Lincoln
William T. Griffin, Lincoln

Mary Harbaugh, Grand Island
John Heil, Omaha

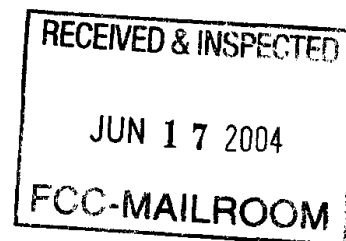
Michael Kneale, Grand Island
J. Paul McIntosh, Norfolk

Jay Noren, Lincoln
Ann Pickel, Omaha

COMMISSION SECRETARY: Rod Bates

June 9, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554



RE: MM Docket No. 99-325

Dear Ms. Dortch:

The Nebraska Public Radio Network, like many state networks of its kind, serves a large geographic area with a very sparse population. In a state stretching 500 miles east to west, two-thirds of the population lives within 50 miles of the eastern border. Ten of the nation's 25 least-populated counties are in Nebraska (and so are six of the nation's 15 poorest). Beyond the wealthier population belt there are hundreds of communities and thousands of people underserved by radio of any kind and who desperately need to have greater choices in radio formats and services. While the two largest population centers in the state have multiple public radio stations, most communities have only one, and given current technology and the economic climate that is a situation which is unlikely to change.

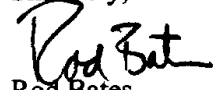
Like many public radio networks across the country, it would be impossible for us to provide public radio programming to most communities in Nebraska without state funding. As is the case in many states the current economy has caused state governments, including Nebraska, to cut back on public broadcasting expenditures. While the State of Nebraska continues to provide as much financial support as it can for public radio across the state through a series of 9 transmitters, which broadcast a single program at a time, it is unlikely those served by transmitters outside of the major cities will ever receive more public radio than they now have under current conditions. In short, providing additional radio services to the underserved is simply not financially possible given the cost of current technology.

However, the advent of terrestrial digital radio broadcast with its promise of multiplexing two program streams from a single transmitter puts multiple public radio services to rural, underserved, and even unserved, audiences within the realm of financial reason.

This is the only practical means of broadcast service extension available to an underserved population in a state of this size, with a population this sparse and rural. It is for this reason we urge the Commission to adopt the HD Radio supplemental audio channel proposal under consideration.

As public broadcasters with a mandate to serve as many audiences with as much content as we can, we believe there is every reason HD Radio with multiplexing capability is a positive and highly desirable development.

Sincerely,


Rod Bates
General Manager

No. of Copies rec'd _____
List ABCDE _____